

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x
UNITED STATES OF AMERICA :
- v - :
VLADIMIR SOLOVIEV, :
: Defendant.
- - - - - x

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: JUL 17 2008
DATE FILED: JUL 17 2008
SUPERSEDING
INFORMATION

S1 07 Cr. 729 (LTS)

COUNT ONE

The United States Attorney charges:

1. From in or about 2004 up to and including in or about 2005, in the Southern District of New York and elsewhere, VLADIMIR SOLOVIEV, the defendant, and others known and unknown, unlawfully, willfully and knowingly engaged in the wholesale distribution in interstate commerce of prescription drugs, to wit, Viagra, without a state license.

(Title 21, United States Code, Sections 331(t), 333(a)(1), 353(e)(2)(A) & Title 18, United States Code, Section 2).

COUNT TWO

The United States Attorney further charges:

2. From on or about September 2, 2000, up to and including on or about March 28, 2005, in the Southern District of New York and elsewhere, VLADIMIR SOLOVIEV, the defendant, unlawfully, willfully, and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent

pretenses, representations and promises, to wit, a scheme to cause Travelers Insurance Company (Travelers) to pay money to a medical clinic and cause Government Employees Insurance Company (GEICO) to pay money to SOLOVIEV based on a false claim of injury in an automobile accident occurring on or about September 2, 2000, placed in a post office and authorized depository for mail matter, a matter and thing to be sent and delivered by the Postal Service, and caused to be delivered by mail according to the direction thereon, such matter and thing, for the purpose of executing such scheme and artifice, to wit, the certified mailing of a letter regarding SOLOVIEV's fraudulent claim by his attorney to GEICO on or about March 10, 2005.

(Title 18, United States Code, Sections 1341 and 2.)

Michael J. Garcia
MICHAEL J. GARCIA
United States Attorney